

United States Government

Department of Energy

memorandum

Rocky Flats Office



000027929

DATE:

JAN 18 1994

REPLY TO

ATTN OF:

ER:JP:00676

SUBJECT:

Action from Year End Review Concerning Industrial Area Interim Measure/Interim Remedial Action

TO:

Autar Rampertaap, Chief Rocky Flats Branch, EM-453, HQ

Attached please find an issue paper addressing your concerns regarding the above referenced document.

If you have any questions or comments, please call Jen Pepe of my staff at (303) 966-2184.

✓ Martin H. McBride
Acting Assistant Manager
Environmental Restoration

Attachment

cc w/ Attachment:
J. Ciocco, EM-453.1
R. Birk, ER, RFO

A-OU12-000104

Industrialized Area Interim Measure/Interim Remedial Action

Issue: The EPA and CDH requested an Industrialized Area Interim Measure/Interim Remedial Action (IA IM/IRA) under their IAG authority (Attachment 1). EM-453 expressed concern that RFO has agreed to increased scope and a streamlined schedule for the IA IM/IRA with no written agreement from the agencies that this effort will allow extensions for IAG milestones associated with the industrial area.

Background: The IA IM/IRA (previously called the Optimal IRAP) was initially suggested by DOE/RFO to the regulatory agencies, due to the inherent difficulty of characterizing and remediating all Individual Hazardous Substance Sites (IHSSs) in the IA prior to Decontamination and Decommissioning (D&D). The IA OUs are currently performing nonintrusive sampling and prioritizing intrusive characterization based on several criteria such as the magnitude of the risk of movement of contamination and accessibility. A spreadsheet and explanation (Attachments 2 and 3) are currently in development examining intrusive work proposed for IHSSs in the industrial area. The intent is to coordinate the intrusive fieldwork with D&D efforts where appropriate. The regulatory agencies are reviewing the spreadsheet.

Conclusions: The regulatory agencies have the authority to require the IM/IRA under the IAG (Part 23, paragraph 150). Dispute resolution was not invoked because RFO believes that the IM/IRA is necessary to ensure the regulatory agencies and the public that non-routine activities associated with D&D and remediation efforts in the IA will not result in the release of contaminants to the buffer zone or off-site. The development of the IM/IRA also serves as a strategy tool during IAG renegotiation of the milestones for these IHSSs. However, the regulatory agencies will not be basing milestone extensions for IA OUs on the IM/IRA. The effort is a proactive move taken by RFO to support reevaluation of IA milestones, and is not expected to be endorsed in writing by the agencies.